

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the matter of)	
)	
Interference Immunity Performance)	ET Docket No. 03-65
Specifications for Radio Receivers)	
)	

COMMENTS OF APCO

The Association of Public-Safety Communications Officials-International, Inc. (“APCO”) hereby submits the following brief comments in response to the Commission’s Notice of Inquiry (“*NOI*”) in the above-captioned proceeding.

APCO is the nation’s oldest and largest public safety communications organizations. Founded in 1935, APCO has over 16,000 members, most of whom are state or local government employees who manage and operate communications systems for police, fire, emergency medical, forestry conservation, highway maintenance, and other public safety agencies. APCO is an FCC-certified frequency coordinator for Part 90 Public Safety Pool channels, and participates regularly in Commission proceedings related to public safety communications.

APCO has long supported the need for receiver standards to improve spectrum efficiency and reduce the potential for harmful interference to critical public safety radio systems. We agree with the Commission’s observation that market incentives and voluntary industry programs may not be sufficient “in situations where we continue to find that command and control spectrum management techniques are in the public interest [e.g., public safety]....” *NOI* at ¶2. While APCO will not be providing

extensive comments at this initial stage of the proceeding, APCO looks forward to reviewing and commenting upon specific recommendations from other parties in response to the *NOI*.

APCO does have some initial concerns that the otherwise beneficial move towards improved receiver performance could serve as a predicate for spectrum management changes that, if applied to public safety spectrum (or adjacent spectrum), would harm the quality and efficiency of emergency communications.

For example, we caution that public safety systems must not be forced into redesigning their systems to meet an “interference-based” model. Public safety systems have usually been designed as “noise-limited” to provide an efficient means of providing ubiquitous coverage over large areas of jurisdiction. An interference-based model would require many more transmitter sites to serve the same geographic areas. State and local governments lack the resources to acquire and build those additional sites. Local community opposition to tower sites (even for public safety systems) and environmental issues (especially in some the remote area that require public safety radio coverage) are also major impediments.

APCO also urges that the Commission not give any serious consideration to relaxing Part 15 rules as a result of improved receiver performance. “Spectrum pollution” from Part 15 devices will rise substantially with the expansion of unlicensed communications operations and the rapid deployment of devices that create RF noise. Improving receivers may help, but stringent Part 15 rules will always be necessary to constrain noise levels. The Commission should also establish methods to measure the

noise floor and to monitor for significant changes that could have a major impact on critical radio systems.

APCO will review carefully the comments of other parties, and intends to submit reply comments addressing issues of particular concern to public safety.

Respectfully submitted,

ASSOCIATION OF PUBLIC-SAFETY
COMMUNICATIONS OFFICIALS-
INTERNATIONAL, INC.

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